

in this action solely because the parcel owned by them abuts the subject strip.

POTOMAC EDISON COMPANY

10. Potomac Edison Company currently owns and utilizes an easement on and over the subject strip for the purposes of overhead electric power transmission lines as successors in interest to the Hagerstown and Frederick Railway Company.

11. That the succession in interest occurred when the Hagerstown and Frederick Railway Company incorporated April 18, 1913 and which had changed its name to the Potomac Public Service Company on April 24, 1922, consolidated with The Potomac Edison Company (Old Cumberland Company) to form the present Potomac Edison Company, incorporated December 31, 1923.

12. The Hagerstown and Frederick Railway Company acquired an easement on and over the subject strip by deed from the Maryland Brick and Supply Company dated December 22, 1913 recorded in Liber HWB 308, folio 66 of the Land Records of Frederick County, Maryland a copy of which is attached hereto and incorporated herein by reference as Exhibit "H".

13. The Plaintiffs acknowledge the validity of the aforementioned easement and are hereby making no claim adverse to its existence and are hereby seeking relief only with regard to the fee simple ownership of the subject strip, said ownership being subject to the rights presently owned and utilized by the Potomac Edison Company as successor in interest to Hagerstown and Frederick Railway Company under the aforementioned deed recorded in Liber HWB 308, folio 66 and dated December 22, 1913.

NORTH AMERICAN PHILIPS CORPORATION

14. North American Philips Corporation is the current record owner and successor in interest to Consolidated Electronics Industries Corp. by virtue of the merger of the North American Philips Company, Inc. and Consolidated Electronics Corp.